

PHILLIP A. TALBERT  
United States Attorney  
KAREN A. ESCOBAR  
Assistant United States Attorney  
2500 Tulare Street, Suite 4401  
Fresno, CA 93721  
Telephone: (559) 497-4000  
Facsimile: (559) 497-4099

Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
RAMON MALDONADO, JR.,  
  
Defendant.

CASE NO. 1:23-CR-169 JLT-SKO

STIPULATION AND ORDER REGARDING  
EXCLUDABLE TIME PERIODS UNDER SPEEDY  
TRIAL ACT

DATE: August 21, 2024  
TIME: 1:00 p.m.  
COURT: Hon. Sheila K. Oberto

**STIPULATION**

1. By previous order, this matter was set for status on August 21, 2024.
2. By this stipulation, defendants now moves to vacate the status conference and set the matter for trial on March 4, 2025, and to exclude time between August 21, 2024, and March 4, 2025, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) Counsel for defendant MALDONADO desires additional time to review the plea agreement with the defendant, consider additional supplemental discovery recently produced, conduct further investigation, and, if unable to resolve, prepare for trial.
  - b) Counsel for defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

1 c) The government does not object to the continuance.

2 d) Based on the above-stated findings, the ends of justice served by continuing the  
3 case as requested outweigh the interest of the public and the defendant in a trial within the  
4 original date prescribed by the Speedy Trial Act.

5 e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
6 et seq., within which trial must commence, the time period of August 21, 2024 to March 4, 2025,  
7 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]  
8 because it results from a continuance granted by the Court at defendant's request on the basis of  
9 the Court's finding that the ends of justice served by taking such action outweigh the best interest  
10 of the public and the defendant in a speedy trial.

11 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
12 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
13 must commence.

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 IT IS SO STIPULATED.

2  
3 Dated: August 15, 2024

PHILLIP A. TALBERT  
United States Attorney

4  
5 /s/ KAREN A. ESCOBAR  
KAREN A. ESCOBAR  
6 Assistant United States Attorney

7  
8 Dated: August 15, 2024

/s/ Alekxia L. Torres Stalling  
Alekxia L. Torres Stalling  
9 Counsel for Defendant  
Ramon Maldonado, Jr.

10  
11  
12 **ORDER**

13 IT IS SO ORDERED.

14  
15  
16 DATED: 8/16/2024

Sheila K. Oberto  
17 The Honorable Sheila K. Oberto  
UNITED STATES MAGISTRATE JUDGE  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28